

IN THE UNITED STATES BANKRUPTCY COURT
District of Puerto Rico

In the Matter of:

EDWARD D AVILES CRUZADO

Debtor(s)

Case No. **13-07924 ESL**

Chapter 13

**MOTION REQUESTING AUTHORIZATION AS
COUNSEL AND FOR EXTENSION OF TIME TO ANSWER
MOTION TO DISMISS**

TO THE HONORABLE COURT:

Debtor has retained the undersigned as attorney to represent him in the above-captioned petition and inform the Court as follows,

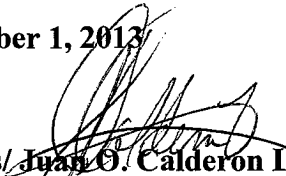
1. Present case was filed on September 27, 2013. Debtor filed the case pro-se, but after receiving counseling by some person with the name Valentin Valdes Ayala, who filed the skeleton of the case and charged \$1,500.00 for that service.
2. Debtor was referred to our office by another client and requested legal representation to continue the case. Most of debtor's debts come from child support arrears.
3. The trustee filed a motion requesting dismissal that is due on December 5 and Debtor needs an extension of ten (10) days until December fifteen (15) to comply with the missing documents.
4. In order to cover the initial expenses generated by the case, we have retained from debtor \$500.00 and we are requesting permission from the court to charge that amount as an initial payment to be deducted from the standard attorney's fees approved by the court. Form 2016 will be filed to disclose present and future payments to the attorney.

WHEREFORE, we respectfully request from this Honorable Court to take notice of the informed above and authorize the legal representation informed. approve the amount of money advanced by debtor as attorney's fees, grant the extension of time to answer the motion filed by the trustee and complete the missing schedules, plan and Statement of Financial Affairs.

CERTIFICATE OF SERVICE

I CERTIFY that a copy of this motion has been filed with the Clerk of the Court that will send notice to the Chapter 13 trustee José R. Carrión Morales and all parties subscribed to the CM/ECF system. All other non participants have been notified on this date with a copy of the motion regular mail using the US Postal Service, as per Master Address List attached.

In Vega Baja, Puerto Rico, this day December 1, 2013


s/ **Juan O. Calderon Lithgow**
JUAN O. CALDERON LITHGOW
ATTORNEY FOR DEBTOR, 205607
PO BOX 1710
VEGA BAJA, PR 00694-1710
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I, Edward D Aviles Cruzado, certify under penalty of perjury that the information contained in this motion is correct to the best of my knowledge, information and belief. That information was provided by me to the attorney.

In Vega Baja, Puerto Rico, this day December 1, 2013


Edward D Aviles Cruzado